

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

GREGG CARL BAIRD,	§
TDCJ-CID NO. 1662122	§
Petitioner,	§
	§
v.	§ CIVIL ACTION NO. H-14-2259
	§
STUART JENKINS, Director, Texas	§
Department of Criminal Justice,	§
Parole Division,	§
Respondent.	§

**RESPONDENT'S UNOPPOSED MOTION FOR EXTENSION OF TIME
WITH BRIEF IN SUPPORT**

This is a habeas corpus case brought by a Texas state prisoner, Gregg Carl Baird, under 28 U.S.C. §§ 2241, 2254. By order of this Court, the Respondent, the Director of the Texas Department of Criminal Justice – Parole Division, has until Tuesday, September 30, 2014 to file his response. The undersigned attorney received this case on September 2, 2014 and promptly ordered the state appellate records, which have not arrived. Once they do arrive they will need to be copied and distributed to the undersigned attorney, who then would need additional time to review them along with Baird's petition before forming a response. Consequently, the undersigned attorney is requesting a thirty-day extension, making the new deadline **Thursday, October 30, 2014**. Baird's habeas counsel, Josh Schaffer, does not oppose the motion.

As further support for the motion, the undersigned notes that he has six other answers or responsive pleadings in other cases due in the next

thirty days. Accordingly, the Director respectfully requests an extension of time up to and including **Thursday, October 30, 2014** to file his response.

This is the Respondent's first request for an extension of time in this cause and it is not designed to harass the Petitioner, nor to unnecessarily delay these proceedings, but to ensure that Baird's claims are properly addressed. The Respondent apologizes to the Court for the necessity of this extension.

Accordingly, the Respondent respectfully requests an extension up to and including **Thursday, October 30, 2014** to file a response.

Respectfully submitted,

GREG ABBOTT
Attorney General of Texas

DANIEL T. HODGE
First Assistant Attorney General

DON CLEMMER
Deputy Attorney General
for Criminal Justice

EDWARD L. MARSHALL
Chief, Criminal Appeals Division

s/ Jon R. Meador
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ATTORNEYS FOR RESPONDENT

CERTIFICATE OF CONFERENCE

I do hereby certify that I conferred with Josh Schaffer regarding the filing of this motion, and he indicated that he did not oppose the motion.

s/ Jon R. Meador
JON R. MEADOR
Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of September 2014 I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

Josh Barrett Schaffer
The Schaffer Firm
1301 McKinney, Suite 3100
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s/ Jon R. Meador
JON R. MEADOR
Assistant Attorney General